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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Ramiro J. Cuadra,

Plaintiff,

v.

Alejandro Mayorkas, in his official capacity
as acting Secretary of Homeland Security;
U.S. Department of Homeland Security;
Tracy Renaud, in her official capacity as
acting Director of U.S. Citizenship and
Immigration Services; U.S. Citizenship and
Immigration Services; the United States of
America; and John Does I through XX,
inclusive,

Defendants.

Case No. 2:21-cv-00470-APG-VCF

**Joint Status Report and Request to
Continue the Stay of the Proceedings an
Additional 60 Days**

The parties, by and through their respective counsel, hereby file this joint status report and stipulate and jointly move the Court to continue to stay all deadlines an additional 60 days in this matter based on the following:

1. On March 23, 2021, Plaintiff filed his Complaint for Relief in the Nature of Mandamus (ECF No. 1), requesting, among other things, that the Court issue a Writ of Mandamus compelling the United States Citizenship and Immigration Services (“USCIS”) to adjudicate Plaintiff’s I-485 application.

1 2. The deadline for the Federal Defendants to answer or otherwise plead was
2 June 23, 2021 (ECF No. 6).

3 3. On June 8, 2021, the parties stipulated to stay this case's proceedings (ECF
4 No. 7). As part of the stipulation, the parties agreed to provide the Court with a joint status
5 report 90 days after the entry of the Court's stay order (ECF No. 7 at 2).

6 4. On June 9, 2021, the Court granted the parties' stipulation (ECF No. 8).

7 5. On September 7, 2021, the parties filed a joint status report and requested an
8 additional 60 days due to Plaintiff's relocation from Las Vegas to Reno (ECF No. 9).

9 6. In November 2021 and January 2022, the parties filed additional joint status
10 reports and requested additional time as USCIS adjudicated Plaintiff's application.

11 7. Since the Court granted the parties' stipulations to extend, USCIS scheduled
12 and held an interview for Plaintiff. Following Plaintiff's interview USCIS sought additional
13 documentary evidence needed to adjudicate Plaintiff's I-485 application.

14 8. Plaintiff's due date to submit the documentary evidence sought by USCIS is
15 mid-May 2022.

16 9. The request to submit documentary evidence sought by USCIS has been
17 delayed. USCIS has agreed to hold off adjudicating Plaintiff's I-485 application until after
18 the receipt and review of the documentary evidence sought.

19 10. USCIS's adjudication of Plaintiff's I-485 application may result in resolution
20 of some or all of the issues raised in the complaint.

21 11. Accordingly, the parties provide this updated status report and hereby
22 request that the Court continue to stay this matter pending resolution or final adjudication
23 of Plaintiff's I-485 application. If the parties are able to resolve this matter, they will
24 promptly file a stipulation of dismissal.

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1 12. If the parties are unable to resolve this matter and the case is not dismissed,
2 the parties agree to file another joint status report 60 days after the entry of the Court's
3 order on this stipulation.

4 Respectfully submitted this 16th day of May 2022.

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6 REZA ATHARI & ASSOCIATES

7
8 /s/ Gary S. Fink
9 GARY S. FINK
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Las Vegas, Nevada 89120
10 *Attorney for Plaintiff*

JASON M. FRIERSON
United States Attorney

/s/ Skyler H. Pearson
SKYLER H. PEARSON
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12 **IT IS SO ORDERED:**

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14 **UNITED STATES DISTRICT JUDGE**

15 **DATED: May 17, 2022**
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